

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:20-MJ-416

v.

Hon. Sally J. Berens
U.S. Magistrate Judge

KALEB FRANKS,

Defendant.

DEFENDANT'S UNOPPOSED MOTION FOR LEAVE TO FILE
UNDER RESTRICTED ACCESS

Defendant, through counsel, moves the Court for leave to file Mr. Franks' written proffer of facts and memo on detention issues under restricted access in the above-captioned case. The government does not oppose the request to file under restricted access. Defendant's request is supported by good cause: the filing at issue contains information related to parties unaffiliated with these proceedings, as well as sensitive medical information. In the spirit or Federal Rule of Criminal Procedure 49.1, restricted-access filing would provide vital privacy protection for this material.

See, e.g., Fed. R. Crim. P. 49.1(e).

Date: October 12, 2020

SCOTT GRAHAM PLLC

By: /s/ Scott Graham
Scott Graham
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IT IS SO ORDERED

Date: _____